

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHUN-KO CHANG, individually and on behalf of
all others similarly situated,

Plaintiff,

-against-

SHEN YUN PERFORMING ARTS, INC., FEI
TIAN COLLEGE, FEI TIAN ACADEMY OF THE
ARTS, DRAGON SPRINGS BUDDHIST INC.,
INTERNATIONAL BANK OF CHICAGO,
SHUJIA GONG a/k/a TIANLIANG ZHANG,
HONGZHI LI, and RUI LI,

Defendants.

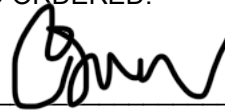
Civil Action No.: 7:24-CV-8980 (PMH)

**MOTION FOR LEAVE TO
WITHDRAW AS COUNSEL**

Application granted. The Clerk of Court is directed to terminate
Justin R. Marino as an attorney in this matter.

The Clerk of the Court is respectfully directed to terminate the
letter motion pending at Doc. 42.

SO ORDERED.



Philip M. Halpern
United States District Judge

Dated: White Plains, New York
February 6, 2025

Pursuant to Local Civil Rule 1.4, the m
withdrawal as counsel for Defendant SHUJ
“Defendant”), in the above-captioned matter, an
from the docket and the ECF distribution list.

I PROCEDURAL HISTORY

On or about November 25, 2024, Plaintiff filed her Complaint. Plaintiff purports to have effectuated service upon the Defendant on or about December 20, 2024, which would have required a responsive pleading on or before January 10, 2025. *See* Affidavit of Service (Dkt. 16).

On or about January 2, 2025, the undersigned filed a notice of appearance on behalf of Defendant and sought an extension of time to answer, move or otherwise respond to the Complaint. *See* Motion (Dkt. 25). The Court granted the motion on January 6, 2025, requiring a responsive pleading to be filed on or before February 19, 2025. *See* Order (Dkt. 26, Jan. 6, 2025).

At all times, the movant faithfully represented the Defendant and worked diligently and efficiently, advocating, respecting and preserving all rights and defenses, and ensuring all deadlines were maintained.

II. REASON FOR WITHDRAWAL

The reason for this request is that the Defendant has retained new counsel (i.e., Steven Schneebaum, Justin Butterfield, Lea Patterson, and Terri Marsh), who have appeared on behalf of Defendant.

The movant anticipates that incoming counsel will need and promptly seek an extension of the current date for responding to the Complaint.

Defendant consents to and has requested the undersigned make this motion.

Date: February 5, 2025
Deer Park, New York

/s/ Justin R. Marino

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Attorneys for Defendant
SHUJIA GONG a/k/a TIANLIANG ZHANG